

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND  
IRBESARTAN PRODUCTS LIABILITY  
LITIGATION,

MDL NO. 2875

HON. ROBERT B. KUGLER

THIS DOCUMENT RELATES TO:

*Peter O'Brien*

**NOTICE OF VIDEOTAPED DEPOSITION OF**  
**PLAINTIFF PETER O'BRIEN**

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order No. 20, Dkt. 632), Defendant Hetero Drugs Ltd. And Hetero Labs Ltd. will take the deposition upon oral examination of Peter O'Brien on December 13, 2021 at 11:00 a.m. EST at Hill Wallack LLP, 21 Roszel Road, Princeton, NJ 08540. Please take further notice that: the deposition will be conducted remotely, using audio-visual conference technology; the court reporter will report the deposition from a location separate from the witness; counsel for the parties will be participating from various, separate locations; the court reporter will administer the oath to the witness remotely; and the witness will be required to provide government-issued identification satisfactory to the court reporter, and this identification must be legible on camera. The deposition shall be videotaped and recorded stenographically, and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The attorney contact for the deposition is:

Jaclyn M. Kavendek, Esq.  
Hill Wallack LLP

21 Roszel Road  
Princeton, NJ 08540  
(609) 924-0808  
[jkavendek@hillwallack.com](mailto:jkavendek@hillwallack.com)

Date: December 6, 2021

Respectfully submitted,

/s/ Eric Abraham  
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*Attorney for Defendant Hetero Labs Ltd. And  
Hetero Drugs Ltd.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 6<sup>th</sup> day of December, 2021 a true and correct copy of the Notice of Videotaped Deposition of Plaintiff Peter O'Brien was served upon the following via ECF, with copies to Counsel for Plaintiffs and all counsel of record by e-mail:

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